

## REMARKS

Applicant respectfully requests reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow. Claims 1-19 were previously cancelled. Claims 36-39 are requested to be cancelled. Claims 20, 32, 35, 40, and 41 are currently being amended. This amendment changes and deletes claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier. After amending the claims as set forth above, claims 20-35, 40 and 41 are now pending in this application.

Claims 36-40 were objected to by the examiner. Claims 36-39 have been cancelled and claim 40 has been amended to address the examiner's rejection. Applicant respectfully requests the objection be withdrawn.

Claims 35 and 37-41 stand rejected under 35 U.S.C. §101 as being non-statutory. Claims 37-39 have been cancelled. Applicant has amended claims 35, 40 and 41 and as such respectfully requests the rejection be withdrawn.

Claims 37-38 stand rejected under 35 U.S.C. §112. In addition, claim 37 stands rejected under 35 U.S. C. §103(a) as being unpatentable over Edwards and O'Leary. These claims have been cancelled.

Claims 20-24, 27-32, 34-36, 38 and 40-41 stand rejected under 35 U.S.C. §102(e) as being anticipated by Edwards. Claims 25-26, 33 and 39 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Edwards and Grant. Applicant respectfully traverses these rejections.

Edwards discloses a system, which recognizes the hyperlinks comprises on a WWW page. The system tailors the hyperlink description text for rendering on a specifically adapted user-interface. The user-interface may be a television screen, a display on a telephone or a display on a mobile phone. The idea of the system is to enable the browsing of hypertext pages using a keypad device without resorting to a pointer devices. As a hypertext page is received from an Internet server, the system sieves out the hyperlinks contained on the

hypertext page. Each hyperlink is associated with a numeric identifier or a function button. The hyperlink descriptions may be edited and numeric codes may be added in front of the descriptions. Some descriptions are shortened for display on a banner. The descriptions of the hyperlinks, to which function buttons are assigned, are presented on a specific banner on the screen. There is a one-to-one correspondence between the function keys and the hyperlinks presented on the banner. The hyperlink descriptions may be colored to correspond to the colors of the function keys. Other hyperlinks may be selected by entering the corresponding numeric code. The hyperlinks currently assigned to the given function keys may be changed by browsing backward or forward using specific keys. Upon pressing a browsing key a new set of previous or following hyperlinks are assigned to the function keys. The banner is also similarly updated.

Grant discloses a device acting as a pocket-sized user interface for Internet browser terminals and the like. The actual hypertext page is displayed using a separate display device and a computer connected thereto. Similarly, the device is connected to the computer (Grant, Fig. 2). The device comprises buttons for the most common functions associated with a typical Internet browser, such as backward, forward, reload and home page (Grant, Fig. 5). In Grant a function key is programmed manually when the user gives an explicit request to associate an Internet URL with the function key (Grant, Col. 5, Lines 47-53). In Grant, a function key is programmed manually when the user gives an explicit request to associate an Internet URL with the function key (Grant, Col. 5, Lines 47-53). Grant fails to teach how the programming is performed. In the absence of more precise disclosure, it is evident for an expert in the field that the URL is associated with the key, for example, by typing the URL or by saving the URL of the page that is currently open. In other words, all these buttons are predefined and pre-programmed.

However, Edwards and Grant, either alone or in combination, fail to disclose or suggest displaying first and second links "on the display in positions corresponding to the locations of the first fixed location input key and the second fixed location input key" as claimed in amended independent claims 20, 32, and 35 of the subject application. Similarly, Edwards and Grant, either alone or in combination, fail to disclose or suggest "a visual

element for displaying on the display of the portable apparatus in a position corresponding to the location of the respective fixed location input key on the portable apparatus ..."

The examiner relies on essentially a single paragraph in Edwards, which states that a mobile phone may be used for displaying processed WWW information using minimum button set navigation techniques, to argue that the features of the independent claims of subject application are taught by Edwards. However, Edwards does not teach any spatial correspondence between the fixed location input keys and the descriptive texts, that is, captions for the links. At best, Edwards teaches merely correspondence between the color of function keys and the color of descriptive text.

Grant similarly fails to teach the features of the independent claims of the subject application. For example, Grant does not disclose displaying two captions indicative of linked pages together with the received pages. Furthermore, in grant the display is not used to display the pages of information and captions together. In view of the disclosure in Grant, it is uncertain whether the display in the remote control device is used to pages of information at all.

Because Edwards does not teach all of elements in the claims of the subject application, Applicant respectfully requests the rejection based on 35 U.S.C. §102 be withdrawn. In addition, a person of ordinary skill in the could not combination the teachings of Edwards and Grant to produce the presently claims invention. As such, Applicant respectfully requests the rejection based on 35 U.S.C. §103 be withdrawn.

Applicant believes that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 06-1450. Should no proper payment be enclosed herewith, as by a

check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 06-1450. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 06-1450.

Respectfully submitted,

Date NOVEMBER 7, 2005

FOLEY & LARDNER LLP  
Customer Number: 27433  
Telephone: (312) 832-4553  
Facsimile: (312) 832-4700

By 

G. Peter Albert, Jr.  
Attorney for Applicant  
Registration No. 37,268